



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
**75 Hawthorne Street**  
**San Francisco, CA 94105-3901**

May 20, 2020

Ms. Kathleen Gill  
Chief, Air Quality Surveillance Branch  
Monitoring and Laboratory Division  
California Air Resources Board  
1927 13th Street  
Sacramento, California 95811

Dear Ms. Gill:

This letter provides the U.S. Environmental Protection Agency's (EPA) review and approval for the California Air Resources Board's (CARB) relocation of the CO, NO<sub>2</sub>, O<sub>3</sub>, SO<sub>2</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub> State/Local Air Monitoring Station (SLAMS) monitors at the Callexico-Ethel Street site (Air Quality System (AQS) Site ID: 06-025-0005).

On February 14, 2020, CARB sent a letter to EPA with a description of this network change. In this letter, CARB explained the need to relocate the Callexico-Ethel Street monitors due to logistics beyond the State's control (i.e., a property development project encompassing the area occupied by the site). Per 40 CFR 58.14, monitoring agencies are required to obtain EPA approval for the relocation of SLAMS monitors.

The Callexico-Ethel Street NO<sub>2</sub> and CO monitor relocations were reviewed under 40 CFR 58.14(b). Generally, relocations may be appropriate for approval if the new site is at a nearby location with the same scale of representation and similar sources (discussed further below), and if the relocation does not compromise data needed for implementation of the National Ambient Air Quality Standards (NAAQS) or if one of the criteria for monitor discontinuation under 40 CFR 58.14(c)(1) through (c)(5) is satisfied. EPA reviewed the NO<sub>2</sub> and CO data against criteria in 40 CFR 58.14(c)(1). According to certified data from 2014-2018 submitted to EPA's AQS, EPA determined that these monitors meet the requirements for discontinuation under CFR 58.14(c)(1) and there is a less than 10 percent probability of exceeding 80 percent of the applicable NAAQS during the next three years (2019-2021) at the site.

The Callexico-Ethel Street SO<sub>2</sub>, O<sub>3</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> monitors are not eligible for removal under 40 CFR 58.14(c)(1) - (c)(5). These monitor relocations were reviewed under 40 CFR 58.14(c)(6), which describes the relocation requirements if a SLAMS monitor is not eligible for removal under the criteria in 40 CFR 58.14(c)(1) through (c)(5), and states that "[a] SLAMS monitor ... may be moved to a nearby location with the same scale of representation if logistical problems beyond the State's control make it impossible to continue operation at its current site."

As described in its February 14, 2020 letter, CARB conferred regularly with EPA Region 9 staff throughout the search for an appropriate relocation site and on meeting siting requirements. This relocation is intended to resolve Appendix E siting issues identified during the 2011 CARB Technical Systems Audit and subsequent logistical issues with the property owner that necessitated a search for an alternative site location. The original Calexico-Ethel Street site (32°40'34.30" N, 115°28'59.10" W) is located in the parking lot of a high school within a mostly residential area. The proposed site location (32°40'44.00" N, 115°28'68.60" W) is approximately 900 feet north of the original site location on the same property, and both sites are in an area characterized by residential and commercial land use as well as undeveloped desert areas. Therefore, the relocation site is expected to measure similar CO, NO<sub>2</sub>, O<sub>3</sub>, SO<sub>2</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub> concentrations from similar sources due to the consistency in land use and proximity to sources, and will not prevent CARB from meeting 40 CFR part 58, Appendix D requirements.

Based on the assessment of the scale of representation at both locations, EPA has determined that CARB's request meets the requirement that the replacement site is at a nearby location with the same scale of representation and does not compromise data needed for implementation of the NAAQS. EPA thus approves relocation of the Calexico-Ethel Street CO, NO<sub>2</sub>, O<sub>3</sub>, SO<sub>2</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub> SLAMS monitors to the proposed site. This approval assumes that the new site will meet all 40 CFR part 58 requirements, including the siting requirements specified in Appendix E. Please work with EPA to ensure that the new site meets all relevant requirements. As this is a relocation, the data from the old and new sites will be combined to form one continuous data record for design value calculations. Please note this in the AQS comment field for both the old and the new AQS site. Also, please attach this letter and include the relevant monitor and site information in your next Annual Monitoring Network Plan.

If you have any questions, please feel free to contact me at (415) 947-4134 or Dena Vallano of my staff at (415) 972-3134.

Sincerely,

Gwen Yoshimura  
Manager, Air Quality Analysis Office  
Air and Radiation Division

cc (via email): Manisha Singh, CARB  
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